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February 28, 2001

Mr. Kratzke  
Docket Management  
National Highway Traffic Safety Administration  
Room PL-401, 400 - 7<sup>th</sup> St. S.W.  
Washington, DC 20590

REF: Docket No. NHTSA-2001-8827; Notice 1 — 17

Dear Sir,

It is my understanding that one of our suppliers of construction equipment, Flow Boy Mfg., is in a position of great difficulty as a result of an under-ride bumper regulation that they have tried unsuccessfully to adhere to. If we lost the ability to work with Flow Boy and like equipment in the transportation of our road-building materials, we would be putting our company and others at risk for trailer tip-over, a not-uncommon occurrence when the standard dump trailer is used to transport road-building materials. Trailer tip-overs result in substantial property damage and, in some cases, injury or death to the workers nearby. Also, we could avoid dangerous overhead obstructions such as utility lines and overpasses.

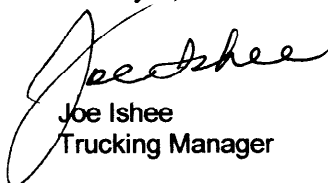
In the work of building roads, we find that the Flow Boy type product really spends a minimal amount of time out on the open road where the general public is operating. When our work is going well, we want the truck that transports our road-building materials to have as short of a trip as possible in order to increase the number of cycle times (and material delivered) by the end of each day. Flow Boys do that job very well and we would sorely miss them if they were forced out of business for what appears to be an unnecessary federal regulation being applied to their equipment and to the equipment offered by other competitive companies. The design of the Flow Boy also cuts down on asphalt material segregation and allows us to give the traveling public a smoother ride and a longer lasting product.

The fact is, their design is such that a car that would hit the rear of a Flow Boy would nearly instantly come in to contact with the rear axle and tires, preventing the dangers that the under-ride guard regulation is designed to prevent.

Flow Boy should continue in their business and this means that they will need an extension to their temporary exemption to the standard 224 regulation.

It would be a great thing if you could help them to achieve this temporary exemption from the 224 standard, but it would be far better if this style of semi-trailer and truck body were exempted altogether.

Thank you,



Joe Ishee  
Trucking Manager